



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 19, 2018

By FedEx and ECF

Robert J. Cleary, Esq.
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Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15 and January 18, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following documents:

- Diplomatic Notes exchanged between the United States Department of State and the Embassy of the People's Republic of China between March 2016 and November 2016, which have been designated "Sensitive Discovery Material" under the February 22 Order (DZ066044-DZ066072); and
- Documents obtained from the Metropolitan Detention Center reflecting call logs for calls placed under the accounts of other inmates

whose accounts the defendant used to place calls as well as money transfers to those inmates, which have been designated “Sensitive Discovery Material” under the February 22 Order (DZ066073-DZ066138).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Douglas M. Pravda
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Enclosures (DZ066044-DZ066138)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)